

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION**

Civil No. 5:18-cv-00017-FL

TIMOTHY DANEHY,)
)
Plaintiff,)
)
v.)
)
EXPERIAN INFORMATION SOLUTIONS,)
INC., TRANS UNION LLC, and EQUIFAX,)
INC.)
)
Defendants.)

JOINT MOTION FOR EXTENSION OF DISCOVERY DEADLINES

Pursuant to Local Rule 6.1(a), Defendant Experian Information Solutions, Inc. (“Experian”), Defendant Trans Union LLC (“Trans Union”), Defendant Equifax Inc. (“Equifax”), and Plaintiff Timothy Danehy (“Plaintiff”) (collectively, “the Parties”) hereby jointly move to extend all unexpired discovery and motion deadlines set forth in the Case Management Order filed with this Court on March 20, 2018, (Dkt. 26) by ninety (90) days, and would respectfully show the Court as follows:

1. On January 19, 2018, Plaintiff filed his Complaint (Dkt. 1), against Defendants, Experian Information Solutions, Inc. (“Experian”), Trans Union LLC (“Trans Union”), and Equifax Inc. (“Equifax”).

2. On February 19, 2018, Trans Union filed a Motion to Dismiss (Dkt. 8). On April 16, 2018, Plaintiff filed a Motion for Leave to File Amended Complaint (Dkt. 33). On May 7, 2018, Trans Union filed a Response in Opposition to Plaintiff’s Motion for Leave to File Amended Complaint (Dkt. 34). Both motions are still currently pending.

3. The Court entered the Case Management Order on March 20, 2018 establishing the dispositive motion deadline as January 15, 2019, the deadline for expert reports as August 31,

2018 for Plaintiff and October 1, 2018 for Defendants, the deadline rebuttal expert reports as October 15, 2018, and the discovery deadline as November 1, 2018 (Dkt. 26).

4. To date, the Parties have not had a reasonable opportunity to fully conduct discovery, including depositions. The parties have attempted to set depositions but have not yet come to an agreement on dates. Further, the Parties seek to secure additional time for discovery to ensure that resources are not wasted if the case is to be dismissed or if Plaintiff is granted leave to amend his Complaint.

5. No party will be prejudiced by this Court granting this Stipulation as all parties jointly seek an extension of these deadlines. The parties believe that allowing the extension will serve the ends of judicial economy and allow this matter to resolve without further court intervention. The parties do not anticipate needing to request any additional time beyond the 90 days requested herein.

6. The requested extensions are not sought for the purposes of delay.

7. It is hereby requested that the Court extend discovery and pretrial deadlines in the present matter as follows:

Deadline to File Dispositive Motions	4/15/2019
Plaintiff's Expert Reports	11/29/2018
Defendants' Expert Reports	12/31/2018
Rebuttal Expert Reports	1/14/2019
Discovery Deadline	1/30/2019

WHEREFORE, the Parties respectfully request this Honorable Court enter and Order (1) granting the Joint Motion for Extension of Discovery Deadlines; (2) providing the Parties with an extension of time until April 15, 2019 to file dispositive motions; (3) providing Plaintiff with an extension of time until November 29, 2018 and Defendants with an extension of time

until December 31, 2018 to serve expert reports, (4) providing the Parties with an extension of time until January 14, 2019 to serve rebuttal expert reports, (5) providing the Parties with an extension of time until January 30, 2019 to complete discovery; and (6) awarding the Parties such further relief as the Court deems appropriate.

Dated: August 22, 2018

Respectfully submitted,

By: Timothy Danahy

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CERTIFICATE OF SERVICE

This is to certify that on August 24, 2018, a true and correct copy of the above and foregoing document has been electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following counsel:

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and I hereby certify that I have mailed by United States Postal Service and emailed the document to the following non-CM/ECF participants:

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